

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SYED IQBAL RAZA, M.D., )  
                              )  
Plaintiff,                )  
                              )  
v.                         ) Civil Action No. 06-132 (JJF)  
                              )  
SIEMENS MEDICAL SOLUTIONS USA, )  
INC., SIEMENS MEDICAL SOLUTIONS )  
HEALTH SERVICES CORP., SIEMENS )  
CORPORATION and SIEMENS AG,    )  
                              )  
Defendants.                )

**STIPULATION OF DISMISSAL WITHOUT PREJUDICE**

WHEREAS, counsel for defendant Siemens Corporation has represented to plaintiff's counsel that Siemens Corporation is a holding company with no substantive involvement in or relation to any of the acts alleged in the Amended Complaint.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN PLAINTIFF SYED IQBAL RAZA, M.D. AND DEFENDANT SIEMENS CORPORATION, THROUGH THEIR RESPECTIVE COUNSEL, THAT:

1. Plaintiff's claims against defendant Siemens Corporation are hereby dismissed without prejudice;
2. In the event plaintiff seeks to reassert its claims against Siemens Corporation in this proceeding or a new proceeding, such claims shall relate back to the filing date of the Complaint in this matter; and
3. Siemens Corporation: (a) shall have an in-house attorney review any and all party discovery propounded in this action by plaintiff; (b) shall, upon reviewing such discovery, confirm to plaintiff in writing, on or before the date responses to such discovery are due from defendants, the extent to which it has in its possession or control documents or

information responsive to such discovery; and (c) shall, if it does have such documents or information in its possession or control, accept and comply fully with a subpoena requesting such documents or information, but by so agreeing, does not waive any claims of privilege.

April 17, 2006

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

*/s/ Adam W. Poff*

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April 17, 2006

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